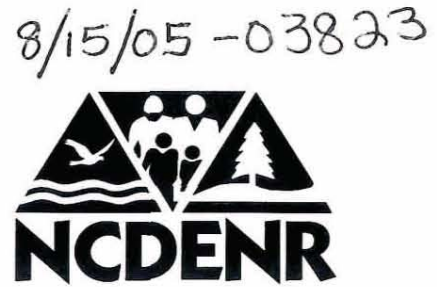


North Carolina  
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Dexter R. Matthews, Director



August 15, 2005

Attention:

Rodger W. Jackson, PE  
NAVFAC Engineering Command Atlantic  
NC/Caribbean IPT  
6506 Hampton Blvd  
Building C, 3<sup>rd</sup> Floor  
Norfolk, VA 23508-1278

RE: Comments on the Draft Site Specific Work Plans for the Confirmatory  
Sampling Investigation at SWMUs 423 and 469  
Soil and Groundwater  
RCRA Permit Number NC6 170 022 580  
MCB Camp Lejeune  
Jacksonville, Onslow County, North Carolina

Dear Mr. Jackson:

The NC Superfund Section has received and reviewed the Draft Site Specific Work Plans for Confirmatory Sampling Investigation at RCRA Solid Waste Management Units (SWMUs) 423 and 469, dated August 2005, for Camp Lejeune, MCB located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. If you have any questions or comments please contact me at (919) 508-8467.

### Specific Comments

1. Next to the last paragraph on page 1-3 states that; "Continuous soil samples will be collected from the soil borings to characterize lithology and screen for the presence of VOCs." It is recommended that this sentence or section reference Appendix A.4.3 which clarifies the details of the Organic Vapor Analyzer (OVA) screening that will be completed at each probe location. If high OVA readings are noted appropriate sampling of this interval could replace the nearest sample interval or be collected in addition to the proposed interval samples. Careful OVA screening at the water table interface is important since we are likely dealing with light non-aqueous phase liquids (LNAPL).

As you know, assure that the screened interval of the piezometers intercepts the groundwater table.

1646 Mail Service Center, Raleigh, North Carolina 27699-1646  
Phone: 919-508-8400 \ FAX: 919-715-3605 \ Internet: [www.enr.state.nc.us](http://www.enr.state.nc.us)

Mr. Rodger Jackson

8-8-2005

Page 2 of 2

2. The gray rectangle shown on Figure 2-2 is identified on the figure as SWMU 423. Based on the step 4 definition on page 3-2 the gray boundary should be the 'study area' not the SWMU. As you know, if the area is contaminated, how we define the SWMU can be very important during the Interim Remedial Action. The same details are contradictory between the text and Figure 2-3 for SWMU 469 as well. The title for Figure 2-3 should also be changed to SWMU 469 rather than SWMU 468.
3. Appendix A, Section A.4.4 discusses investigation derived waste (IDW). Please specify any secondary staging areas for IDW from the investigation work or state that no investigation derived waste will be used for this work. As we have discussed, IDW must be properly staged and this should not be a random decision made by the RAC contractor.
4. Section 4.1.4 of Appendix C, Health and Safety Plan States that the Plan does not cover contractors that are contracted directly to the client or the owner. However, anyone who goes on any CERCLA site must have proper 40-hour training and should be knowledgeable of the Master Health and Safety Plan (HASP). The State oversight person always has their own HASP in addition to thorough understanding of the Master HASP.

If you have any questions or comments, please contact me, at (919) 508-8467 or email [randy.mcelveen@ncmail.net](mailto:randy.mcelveen@ncmail.net)

Sincerely,

Randy McElveen  
Environmental Engineer  
NC Superfund Section

Cc: Dave Lown, NC Superfund Section  
Ken Cobb, EMD/RCRA  
Bob Lowder, EMD/IR  
Louis Palmer, CH2MHill

## Capito, Bonnie P CIV NAVFAC Lant

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**From:** Jackson, Rodger W CIV NAVFAC Lant  
**Sent:** Tuesday, October 04, 2005 2:08 PM  
**To:** Capito, Bonnie P CIV NAVFAC Lant  
**Subject:** FW: State Comments on the Confirmatory Sampling Work Plan SWMUs 423 & 469



August 15, 2005 August 15, 2005  
Sampling Inves... Sampling Inves...



Lejeune site file

Rodger W. Jackson, P.E.  
NAVFAC Atlantic  
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6506 Hampton Blvd.  
Norfolk, Va. 23508-1278  
Tel: (757) 322-4589 Fax: (757) 322-4530  
Email: rodger.jackson@navy.mil

-----Original Message-----

From: Randy McElveen [mailto:Randy.McElveen@ncmail.net]  
Sent: Monday, August 15, 2005 13:04  
To: David Lown; jculp; Robert Sok; Lowder CIV Robert A; Mat Louth;  
Jackson, Rodger W CIV NAVFAC Lant; Cobb CIV Kenneth W; Louise Palmer  
Subject: State Comments on the Confirmatory Sampling Work Plan SWMUs 423  
& 469

See attached comments from the State. If anyone has any questions  
please give me a call or respond to this email.

Thanks,  
Randy McElveen, NC Superfund Section

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"He is no fool who gives what he cannot keep to gain what he cannot lose."  
Jim Elliot, Shadow of the Almighty

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